

# EXHIBIT A

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**\*\*\*COURT AUTHORIZED NOTICE\*\*\***

**\*\*\*THIS IS NOT AN ADVERTISEMENT FROM A LAWYER\*\*\***

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
ST. LOUIS DIVISION

LAUREN CUPP, Individually and for  
Others Similarly Situated

No. 4:23-cv-00071

v.

MHM HEALTH PROFESSIONALS, LLC.  
d/b/a CENTURION PROFESSIONALS

**NOTICE OF UNPAID OVERTIME LAWSUIT**

**TO: All MHM Health Professionals, LLC direct care employees in Florida, Indiana, and Kansas who were employed on a full-time basis, classified as hourly non-exempt, and were subject to MHM's auto-meal break deductions policy ("Hourly Direct Care Workers")**

**RE:** Collective action lawsuit seeking unpaid overtime wages.

**DEADLINE TO RETURN CONSENT FORM:** \_\_\_\_\_, <sup>1</sup> 2024

**1. Why Are You Getting This Notice?**

A lawsuit alleges MHM Health Professionals, LLC d/b/a Centurion Professionals (Centurion Professionals) violated a federal law known as the Fair Labor Standards Act (FLSA). The FLSA requires employers to pay overtime to employees who work more than 40 hours in a week unless the employees are "exempt." The lawsuit alleges Centurion Professionals failed to pay affected employees for all overtime hours by automatically deducting a meal break from their time worked. Centurion Professionals denies that its automatic meal deduction policy caused employees not to receive appropriate overtime pay. The Court expresses no opinion on either side's allegations or defenses.

The Court has conditionally allowed or "certified" this case as a collective action lawsuit. This notice is intended to describe how you can participate in this collective action if you wish to do so. You received this notice because you were employed by Centurion Professionals as a full-time Hourly Direct Care Worker any time after February 11, 2021. As a result, you may choose to join the lawsuit

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<sup>1</sup> The date will be 60 days after the day the notice is mailed/emailed.

and assert a claim for unpaid overtime wages if you meet the suit eligibility requirements provided below.

## **2. What Is This Lawsuit About?**

Lauren Cupp (Plaintiff), a former Centurion Professionals employee, filed this collective action lawsuit alleging that Centurion Professionals did not pay its Hourly Direct Care Workers in Florida, Indiana, and Kansas time and half for all hours worked over 40 hours in a workweek. FLSA, 29 U.S.C. § 201, *et seq.* Instead, Plaintiff alleges Centurion Professionals automatically deducted a 30-minute meal break from Hourly Direct Care Workers' time, regardless of if they received a *bona fide* break. By returning a Consent to Join Wage Claim Form, you can make a claim to recover unpaid overtime during the time period of February 11, 2021 to present if you meet the suit eligibility requirements provided below.

## **3. Are You Eligible to Join This Lawsuit?**

You can choose to join this lawsuit if you worked for or currently work for Centurion Professionals in Kansas, Indiana, and Florida between February 11, 2021 and February 11, 2024 as a full-time Hourly Direct Care Worker, and if you received an automatic meal deduction that resulted in your failing to receive compensation for a meal period during which you worked.

## **4. What Are Your Options?**

If you want to join this lawsuit and make a claim for unpaid overtime wages, you must read, sign, and return the attached Consent to Join Wage Claim Form so that it can be filed with the Court by [60 days after Notice]. You may return your Consent to Join Wage Claim Form by filling out the attached form and returning it by mail, email, or fax to:

**Cupp v. Centurion Professionals**  
**Josephson Dunlap, LLP**  
**11 Greenway Plaza, Suite 3050**  
**Houston, Texas 77046**  
**Telephone: (888) 992-2990**  
**Fax: (713) 352-3300**  
**E-mail: [info@mybackwages.com](mailto:info@mybackwages.com)**

You may also contact an attorney of your choice.

## **5. Effect Of Making A Claim For Unpaid Overtime Wages.**

If you return a Consent to Join Wage Claim form, you will conditionally become a part of the lawsuit. You may be required to respond to questions under oath and/or produce documents related to your claim. Centurion Professionals may ask the Court to decertify this conditionally-certified case. If the Court decertifies the case, your claim will be dismissed without prejudice. If the case is not successful, you will receive nothing. If you do not wish to be a part of the collective action lawsuit, you do not need to do anything. The decision to join is entirely yours.

**The FLSA only allows workers to recover up to the past three years of back wages. Workers who do not return a Consent to Join Wage Claim Form within the three-year deadline may not be able to recover overtime for work performed in the past for Centurion Health.**

#### **6. Retaliation And Blackballing Is Prohibited**

Federal law prohibits anyone from firing or in any other way discriminating against you because you join this case. Centurion Professionals' policy also prohibits retaliating or blackballing anyone for participating in this lawsuit and encourages employees to report suspected retaliation.

If you suspect any retaliation for participating in this suit, you should notify the attorneys listed below or an attorney of your choosing.

#### **7. Your Legal Representation If You Join.**

If you choose to join this collective action lawsuit, your attorneys will be Michael A. Josephson and Carl A. Fitz of the law firm JOSEPHSON DUNLAP, LLP and Richard (Rex) Burch of the law firm BRUCKNER BURCH PLLC.

#### **8. How Can You Receive More Information?**

If you have any questions about the collective action or your legal rights, you may contact a lawyer of your choosing, or Plaintiffs' counsel directly at:

Michael A. Josephson  
Carl A. Fitz  
**Josephson Dunlap, LLP**  
11 Greenway Plaza, Suite 3050  
Houston, Texas 77046  
Toll Free: (888) 992-2990  
Fax: 713.352.3300  
E-mail: [info@mybackwages.com](mailto:info@mybackwages.com)

Richard (Rex) Burch  
**BRUCKNER BURCH PLLC**  
11 Greenway Plaza, Ste. 3025  
Houston, Texas 77046  
Phone: 713.877.8788  
Fax: 713.877.8065  
Email: [frontdesk@brucknerburch.com](mailto:frontdesk@brucknerburch.com)

**You should not contact the Court or Centurion Health's attorneys about this lawsuit or seek advice from them on whether you should participate.**

#### **9. You Have Sixty (60) Days to Join this Lawsuit.**

Your determination of whether or not to take action should be made promptly. The law only allows a person to recover up to three (3) years of back wages from the date the Consent to Join Wage Claim Form is filed. All consent forms must be received so that plaintiffs' counsel can file them no later than [sixty days after Notice]. A Consent to Join Wage Claim Form is enclosed with a self-addressed stamped envelope.

## CONSENT TO JOIN WAGE CLAIM LAWSUIT AGAINST CENTURION PROFESSIONALS

Printed Name: \_\_\_\_\_

1. I hereby consent to joining the collective action lawsuit filed against MHM Health Professionals, LLC, d/b/a Centurion Professionals (“Centurion Professionals”) to pursue my claims of unpaid overtime during the time that I worked for Centurion Professionals.
2. I understand that this lawsuit is brought under the Fair Labor Standards Act, and I consent to be bound by the Court’s decision.
3. I designate the law firms and attorneys at JOSEPHSON DUNLAP, LLP and BRUCKNER BURCH PLLC as my attorneys to prosecute my wage claims.
4. I consent to having Plaintiff and Plaintiff’s Counsel make all decisions regarding the litigation, including all decisions regarding settlement or trial, the terms of settlement and release of claims, and agreements regarding attorney fees and costs.
5. If needed, I authorize the Plaintiff’s lawyers to use this consent to re-file my claim in a separate lawsuit or arbitration against the Defendant.

Signature: \_\_\_\_\_

Date Signed: \_\_\_\_\_

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**Please print or type the following information. The information below this line will be kept confidential:**

\_\_\_\_\_  
Address

\_\_\_\_\_  
City/State/Zip

\_\_\_\_\_  
Home Telephone Number

\_\_\_\_\_  
Cell Phone Number

\_\_\_\_\_  
E-mail Address

\_\_\_\_\_  
Estimated Dates of Employment

\_\_\_\_\_  
Positions Held with Centurion  
Professionals

\_\_\_\_\_  
Locations Worked for Centurion  
Professionals

**RETURN THIS FORM BY MAIL, EMAIL, OR FAX TO:**

**Cupp v. Centurion Professionals**  
**Josephson Dunlap, LLP**  
**11 Greenway Plaza, Suite 3050**  
**Houston, Texas 77046**  
**Fax: (713) 352-3300**  
**E-mail: [info@mybackwages.com](mailto:info@mybackwages.com)**

**E-MAIL MESSAGE TO POTENTIAL CLASS MEMBERS**

**Subject: Notice of unpaid overtime lawsuit against Centurion**

Dear Centurion Direct Care Worker:

Attached is the Court-authorized Notice regarding a collective action lawsuit against Centurion alleging you were not paid overtime compensation as required by a federal law known as the Fair Labor Standards Act (FLSA). Centurion Professionals denies that its automatic meal deduction policy caused employees not to receive appropriate overtime pay. The Court expresses no opinion on either side's allegations or defenses.

You are receiving this message because Centurion's records indicate you are eligible to participate in this collective action lawsuit seeking to recover unpaid overtime wages and your rights may be affected by its outcome. The attached Notice explains the steps you need to take if you want to join. You can review and sign the forms to join the case here «hyperlink».

If you have any questions, please feel free to contact me at «phone» or by e-mail at «email».

«Signature Block»